

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JOE FASANO, *et al.*,

Plaintiffs,

-v.-

GUOQING LI, *et al.*,

Defendants.

Civil Action No. 16-cv-8759 (KPF)

**DECLARATION OF PEGGY YU YU ON
BEHALF OF DANGDANG HOLDING
COMPANY LIMITED**

I, Peggy Yu Yu, under 28 U.S.C. § 1746, declare as follows:

1. I have knowledge of the matters set forth here, either through personal experience or a review of company records. If called to testify, I could and would testify to the truth of the following. I make this declaration in support of Defendants' Motion to Dismiss on *Forum Non Conveniens* Grounds.

2. I am the Director of Dangdang Holding Company Limited ("Dangdang Holding"). I have authority to make this declaration on behalf of Dangdang Holding.

3. Dangdang Holding is an exempted company with limited liability incorporated under the laws of the Cayman Islands. Dangdang Holding has a registered agent for service of process in the Cayman Islands and consents to service in the Cayman Islands through that agent.

4. Dangdang Holding's business address is: 21/F, Jing An Center, No. 8 North Third Ring Road East, Chaoyang District, Beijing, People's Republic of China.

5. Since on or about September 20, 2016, Dangdang Holding has owned 100% of E-Commerce China Dangdang, Inc. Dangdang Holding has no operations other than holding such stock.

6. Substantially all of Dangdang Holding's company files are located in the People's

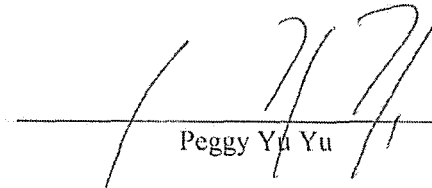
Republic of China.

7. Dangdang Holding's directors and officers all reside in the People's Republic of China.

8. Dangdang Holding does not have any offices, employees, directors, or operations in the State of New York or elsewhere in the United States of America.

I declare under penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct.

Executed on February 20, 2017.


Peggy Yu Yu